

**AFFIDAVIT**

Your Affiant, William L. Hasty, deposes and states:

1. Your Affiant is a Special Agent with the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so employed since October 2010. Affiant has been assigned to the investigation of violent crime matters in the Cleveland Division for approximately six (6) months and with the Federal Bureau of Investigation for seven (7) years. Affiant has been charged with the investigation of federal crimes involving bank robberies, drugs, weapons violations, kidnaping, human trafficking, and other general criminal offenses in the Northern District of Ohio. Affiant is empowered to conduct investigation of and to make arrests for federal offenses, *see* 18 U.S.C. § 3052. At all times during this investigation described in this affidavit, Affiant has acted in an official capacity as a SA of the FBI.
2. Affiant has participated in all of the usual methods of investigation, including, but not limited to, physical surveillance, the questioning of witnesses, and the analysis of evidence. Affiant has participated in the execution of arrest and search warrants resulting in the seizure of illegal weapons, drugs, currency, and stolen property. Affiant has supervised the activities of informants and participated in the execution of consensual monitoring and court ordered Title III Wiretaps.

**PROBABLE CAUSE**

3. On Friday, April 3, 2017, at approximately 10:05a.m., three unidentified black males entered and attempted to rob the Buckeye State Credit Union, located at 15808 Chagrin Boulevard, Shaker Heights, Ohio. The first subject jumped the teller counter and held the victim teller at gun point demanding money. The victim teller attempted to get money

out of the money dispensing machine; however no money was released out of the machine after several attempts by the victim teller. The second subject pulled another employee from their office at gun point demanding money. The second victim teller tried to pull money from the money machine but was also unsuccessful. The victim teller also tried to pull apart the machine and show the subject there was no access to the money. The third subject entered, jumped the teller counter and pulled an employee from the back office. Both victim tellers, in fear for their lives, were telling the subjects that they were unable to get any money out of the machines. After realizing the situation, the subjects fled the scene in a getaway vehicle without any money in an unknown direction. The responding Shaker Heights Police Department officers were unsuccessful in locating the subjects.

4. Surveillance photos and video obtained from the bank and viewed by your Affiant showed three black males wearing sweatpants/hoodies with the hood drawn tightly around their faces and with at least two handguns, enter the bank. Investigators interviewed the bank tellers, who stated two of the suspects jumped over the counter, putting guns to the heads of the employees, and demanding money.
5. At approximately 12:20 pm the same day, the suspects drove to the Cardinal Community Credit Union located at 34465 Euclid Avenue, Willoughby, Ohio and robbed it at gunpoint. Prior to the bank robbery, a tall, skinny, black male, wearing a t-shirt and sweatpants entered the bank via the main door and walked toward the teller counter and asked to use the restroom. After being told that there was no restroom available, the male departed the bank. The teller believed this person was "casing" the bank.

6. Approximately five minutes later three bank robbers entered the bank and ran to the teller counter. One of the bank robbers jumped over teller counter and pointed a gun at victim teller #1 who was standing at teller position #1. The bank robber then demanded she open her teller drawer. At this time, the teller drawer was locked and she had difficulty opening it. The bank robber then yelled at her, stating "the fucking money fast". The bank robber then grabbed her by her hair, pushed her to her knees, and put a gun to her head as she opened her teller drawer. The teller complied with the robber and provided him with \$2,905.15 of U.S. currency. The third bank robber ran up to teller window #2 and confronted victim teller #2. The bank robber then yelled at teller #2, stating "give me all your money. Hurry the fuck up." While teller #2 was trying to open her teller drawer, the bank robber pointed a gun at her. Teller #2 complied with the robber and provided him with \$7,434.00 of U.S. currency. The bank robbers then departed the bank, got into a silver colored Ford Fusion 4 door sedan, license plate number EYD-9990, and quickly departed the area.
7. Subsequently, the getaway vehicle was observed by law enforcement driving erratically. The vehicle was pursued by law enforcement personnel from several departments. The officers chased this vehicle to approximately Interstate 90 at Eddy Road in Cleveland, Ohio at which time they lost sight of it.
8. During a proffer session, a cooperating defendant admitted his role in both above credit union robberies. The cooperating defendant stated he committed the robberies with Richode Meredith-Hill and two juveniles. The cooperating defendant identified a photo of himself and the two juveniles sitting on the getaway vehicle. The license number EYD-9990 was visible in the photo.

9. Subsequent to an arrest for domestic violence and a search warrant for DNA in the above matters, Richode Meredith-Hill was interviewed at the Cleveland Division of the FBI. During the recorded interview, Richode Meredith-Hill confessed to his role in both bank robberies, stating he served as a driver for each and he committed them with two other individuals, including the cooperating defendant who had previously named Meredith-Hill as a suspect. Meredith-Hill stated he initially did not take any of the proceeds from the Willoughby robbery but said after three days he took approximately \$1000.00.

#### **INTERSTATE NEXUS DETERMINATION**

10. Your Affiant states that the attempted taking of money on April 3, 2017, at approximately 10:05a.m., was from the custody, control or possession of Buckeye State Credit Union, a financial institution the accounts of which were then insured by the National Credit Union Administration Board.

11. Your Affiant states that the taking of money on April 3, 2017, at approximately 12:20 p.m., was from the custody, control or possession of Cardinal Community Credit Union, a financial institution the accounts of which were then insured by the National Credit Union Administration Board.

#### **CONCLUSION**

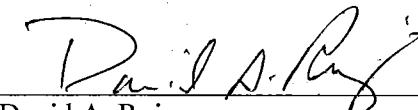
12. Based on the above listed facts and circumstances your Affiant believes and asserts that there is probable cause to believe that on April 3, 2017, in the Northern District of Ohio, Richode Deon Meredith-Hill did aid an abet another who by force and violence, or by intimidation take, and attempt to take, from the person or presence of another, or obtain or attempt to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings

and loan association, in violation of Title 18, U.S.C., Section 2113(a) and 2, and did, in the commission of the offense aid and abet another to assault any person, or put in jeopardy the life of any person by the use of a dangerous weapon or device, in violation of Title 18, U.S.C., Section 2113(d) and 2.



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William L. Hasty, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 25th day of May, 2018.



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David A. Ruiz  
United States Magistrate Judge